

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

HORNBLOWER HOLDINGS LLC, *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 24-90061 (MI)
)
) (Jointly Administered)
)

**NOTICE OF CANCELLATION OF HEARING TO APPROVE DEBTORS'
DESIGNATION OF STALKING HORSE BIDDER(S) AND BID PROTECTIONS**

[Related to Docket Nos. 166, 256]

PLEASE TAKE NOTICE that, on February 21, 2024, the above-captioned debtors and debtors in possession (collectively, the “Debtors”) filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code in the United States Bankruptcy Court for the Southern District of Texas (the “Court”).

PLEASE TAKE FURTHER NOTICE that, on February 28, 2024, the Court entered the *Order (A) Approving (I) Bidding Procedures for the Sale of the AQV Debtors’ Assets, (II) Procedures Regarding Bid Protections, (III) the Scheduling of Certain Dates with Respect Thereto, (IV) the Form and Manner of Notice Thereof, (V) Contract Assumption, Assignment, and Rejection Procedures, and (VI) Certain Procedures to Otherwise Dispose of the AQV Assets, and (B) Authorizing the Debtors to Enter into Agreements for the Sale of Their Assets Free and Clear*

¹ The last four digits of Debtor Hornblower Holdings LLC’s tax identification number are 6035. Due to the large number of debtor entities in these chapter 11 cases, which are being jointly administered, a complete list of the debtor entities and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://omniagentsolutions.com/Hornblower>. The location of the Debtors’ service address for purposes of these chapter 11 cases is Pier 3 on The Embarcadero, San Francisco, CA 94111.

of All Liens, Claims, And Encumbrances [Docket No. 166] (the “Bidding Procedures Order”),² approving, among other things, Bidding Procedures with respect to the Debtors’ proposed sale of the AQV Assets.³

PLEASE TAKE FURTHER NOTICE that, pursuant to the Bidding Procedures, the original deadline for the Debtors to designate one or more Stalking Horse Bidders (the “Stalking Horse Designation Deadline”) was March 15, 2024.

PLEASE TAKE FURTHER NOTICE that, on March 15, 2024, pursuant to the *Notice of Extension of Deadline to Designate Stalking Horse Bidder Pursuant to Bidding Procedures* [Docket No. 256] and in accordance with the Bidding Procedures, the Debtors extended the Stalking Horse Designation Deadline to March 19, 2024.

PLEASE TAKE FURTHER NOTICE that, as of the Stalking Horse Designation Deadline, the Debtors had not designated one or more Stalking Horse Bidders.

PLEASE TAKE FURTHER NOTICE that, accordingly, a hearing to approve the Debtors’ designation of one or more Stalking Horse Bidders and any Bid Protections, *originally* set for **March 21, 2024, at 3:30 p.m. (prevailing Central Time)** before the Honorable Judge Marvin Isgur, United States Bankruptcy Judge, and *adjourned* to **March 25, 2024, at 8:00 a.m. (prevailing Central Time)**, ***will not be held*** by the Court.

PLEASE TAKE FURTHER NOTICE that nothing herein shall limit the Debtors’ ability to modify the Bidding Procedures further in accordance with the terms thereof.

[Remainder of page intentionally left blank.]

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Bidding Procedures Order.

³ The Bidding Procedures are attached as Exhibit 1 to the Bidding Procedures Order.

March 20, 2024

Respectfully submitted,

By: /s/ John F. Higgins

PORTER HEDGES LLP

John F. Higgins (TX Bar No. 09597500)
M. Shane Johnson (TX Bar No. 24083263)
Megan Young-John (TX Bar No. 24088700)
1000 Main St., 36th Floor
Houston, Texas 77002
Telephone: (713) 226-6000
Facsimile: (713) 226-6248
jhiggins@porterhedges.com
sjohnson@porterhedges.com
myoung-john@porterhedges.com

- and -

**PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP**

Paul M. Basta (admitted *pro hac vice*)
Jacob A. Adlerstein (admitted *pro hac vice*)
Kyle J. Kimpler (admitted *pro hac vice*)
Sarah Harnett (admitted *pro hac vice*)
Neda Davanipour (admitted *pro hac vice*)
Kyle R. Satterfield (*pro hac vice* pending)
1285 Avenue of the Americas
New York, New York 10019
Telephone: (212) 373-3000
Facsimile: (212) 757-3990
pbasta@paulweiss.com
jadlerstein@paulweiss.com
kkimpler@paulweiss.com
sharnett@paulweiss.com
ndavanipour@paulweiss.com
ksatterfield@paulweiss.com

*Proposed Counsel to the Debtors and
the Debtors in Possession*

Certificate of Service

I certify that on March 20, 2024, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ John F. Higgins

John F. Higgins